

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VALERIE A. SHORE,

Plaintiff,

v.

No. 04 CV 4152 (RJS)

PAINWEBBER LONG TERM DISABILITY  
PLAN, *et al.*

ECF Document

Defendants.  
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**SUPPLEMENTAL DECLARATION OF DAVID S. PREMINGER  
IN SUPPORT OF MOTION FOR ATTORNEY'S FEES AND  
REIMBURSEMENT OF COSTS AND EXPENSES**

DAVID S. PREMINGER declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner in the law firm of Rosen Preminger & Bloom LLP ("RP&B"). I am counsel for the plaintiff, Valerie A. Shore, in this action, and make this declaration in further support of plaintiff's motion for an award of attorney's fees and reimbursement of litigation costs and expenses (the "Motion").

2. Attached as Exhibit 1 are my firm's billing records for fees and costs incurred herein since December 2, 2007, the last date for which records had been created at the time of the filing of the Motion. Additional costs totaled \$3.25. The majority of the additional time spent was in researching and drafting plaintiff's accompanying reply memorandum of law.

Timekeeper	Hours	Billing Rate	Total
David S. Preminger	7.5	\$610.00 per hour	\$4,575.00
Helen J. Lukievics	19.4	\$385.00 per hour	7,469.00
Total Fees:			\$12,044.00

When added to the pre December 3, 2007 amounts of \$95,183.00 in fees and \$2,152.46 in costs, total fees requested are \$107,227.00 and total costs requested are \$2,155.71. The combined total of fees and costs is \$109,382.71.

3. My qualifications were set forth in my December 3, 2007 declaration in support of the Motion. Ms. Lukievics is a 1980 graduate of the Rutgers School of Law Newark. Prior to working for plaintiff's firm, she was an associate at Crummy, Del Deo, Dolan, Griffinger & Vecchione in Newark, NJ. Ms. Lukievics thus has more than 27 years of litigation experience.

4. Attached as Exhibit 2 is a copy of defendant Reliance Standard Life Insurance Company's Annual Statement as of December 31, 2005 (apparently the most recent one available) which was downloaded from its website.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 31, 2007 in New York, New York

/s/ David S. Preminger  
DAVID S. PREMINGER